

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter **NOT**

Advanced Television Systems
and Their Impact upon the
Existing Television Broadcast
Service

MM Docket No. 87-268

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's Rules, the Association for Maximum Service Television, Inc. ("MSTV") hereby requests an extension of time for filing comments and reply comments in response to the Second Further Notice of Proposed Rulemaking released in the above-captioned proceeding ("Second Further Notice"). For the reasons set forth below, MSTV requests that these filing deadlines be extended fourteen days, with comments due November 16, 1992 and reply comments due December 16, 1992.

On four previous occasions, MSTV has undertaken primary responsibility for coordinating the preparation of joint petitions and comments in this proceeding on behalf of a wide cross-section of broadcast companies, networks and trade associations, with one-hundred and one parties signing on to the most recently filed joint comments. See Petition for Notice of Inquiry (filed February 13, 1987); Joint Broadcaster Comments (filed Nov. 30, 1988); Joint Broadcaster Comments (filed Dec. 20, 1991); Joint Broadcaster Comments (filed July 17, 1992). By helping to build consensus among

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broadcasters and presenting their unified views to the Commission, these joint pleadings have served to focus the record in this proceeding as to how best to implement broadcast ATV in this country.

MSTV is again undertaking the task of coordinating and preparing joint broadcaster comments to address the critical allotment/assignment issues raised in the Second Further Notice. On September 29, 1992, in response to a request filed by a group of broadcast organizations including MSTV, the Commission clarified certain aspects of the Second Further Notice and also extended the time for filing comments to November 2, 1992, and filing reply comments to December 2, 1992, in order to "further the development of a full record on ATV channel policy issues." Order Extending Time for Filing Comments, MM Docket No. 87-268, Mimeo No. DA 92-1344 (released September 30, 1992). This extension has allowed MSTV, in coordination with the other joint parties, to begin preparation of comments to address these issues based on the clarifications made by the Commission and other data now being generated through the Advisory Committee process.

Also under the auspices of the Broadcasters Caucus,^{1/} MSTV is undertaking the task of providing data

^{1/} Members include Association of America's Public Television Stations, Association of Independent Television Stations, Inc., CBS, Inc., Capital Cities/ABC, Inc., Fox Television Stations, National Broadcasting Company, Inc., National Association of Broadcasters, Public Broadcasting Service and the Tribune Broadcasting Company.

relating to the spectrum use implications of the proponent systems for Working Party 3 of the Planning Subcommittee of the Commission's ATV Advisory Committee. These data will be provided under two different scenarios -- VHF-UHF and all UHF. That information must be provided to PSWP3 for the GI Digicipher and Zenith 1 AT&T DSC-HDTV systems over the next three weeks. These responsibilities have created extraordinary demands on the MSTV personnel and its available hardware resources. As the Commission noted in its release of September 30, 1992, this system performance information will also be extremely useful in analyzing the various assignment/allotment issues raised in the Second Further Notice.

In addition, the current deadline for filing comments coincides with a long-scheduled, semi-annual meeting of MSTV's board of directors on the West Coast to be held during the week of October 26-30. This meeting will require the active preparation and participation of the same MSTV staff and counsel. Under the present Commission schedule for the comments in this proceeding the critical process of coordinating the views of many different broadcast organizations would coincide with the week of MSTV's fall board meeting.


To avoid this scheduling conflict, and to allow sufficient time to prepare joint comments on behalf of the

broadcast industry, MSTV respectfully requests a fourteen-day extension of the comment and reply comment deadlines.

Respectfully submitted,

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